

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

KOCH FOODS OF ALABAMA LLC,

Plaintiff,

V.

GENERAL ELECTRIC CAPITAL  
CORPORATION,

Defendant.

Civil Action Number: 2:07cv522 -MHT

**MOTION FOR ADMISSION *PRO HAC VICE***

COMES NOW the undersigned, pursuant to Local Rule 83.1(b), and respectfully moves this Court for admission *pro hac vice* of Ann Elizabeth Pille (“Ms. Pille”) in the above-styled cause. As grounds for this motion, the undersigned shows as follows:

1. Ms. Pille has been retained by Defendant General Electric Capital Corporation to represent it in connection with this action.

2. Ms. Pille is an attorney at the firm of Reed Smith LLP, 10 South Wacker Drive, Chicago, Illinois, 60606, (312) 207-1000 (telephone), (312) 207-6400 (facsimile), [apille@reedsmith.com](mailto:apille@reedsmith.com).

3. Ms. Pille is qualified, admitted, and licensed to practice before the United States District Court for the Northern District of Illinois. Attached hereto is the Certificate of Good Standing for Ms. Pille issued by that Court. Ms. Pille has never been disciplined or otherwise disqualified from the practice of law nor has an application for her *pro hac vice* admission in a case been denied.

WHEREFORE, PREMISES CONSIDERED, the undersigned respectfully requests that Ms. Pille be admitted to practice *pro hac vice* before this Court.

Dated: March 28, 2008.

By: /s/ Rusha C. Smith  
Attorney for General Electric Capital  
Corporation

OF COUNSEL:  
Rusha C. Smith  
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CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Thomas G. Mancuso, Esq.  
Thomas T. Gallion, III, Esq.  
Constance C. Walker, Esq.  
Haskell Slaughter Young & Gallion, LLC  
305 South Lawrence Street  
Montgomery, AL 36103-4660

Eugene J. Geekie, Jr., Esq.  
Mike Xu, Esq.  
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6600 Sears Tower  
Chicago IL 60606

/s/ Rusha C. Smith  
COUNSEL

## CERTIFICATE OF GOOD STANDING



*United States of America*

}ss. Ann Elizabeth Pille


*Northern District of Illinois*

I, Michael W. Dobbins, Clerk of the United States District Court  
for the Northern District of  
Illinois,

DO HEREBY CERTIFY That Ann Elizabeth Pille  
was duly admitted to practice in said Court on (02/02/2005)  
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois  
on (03/27/2008 )

Michael W. Dobbins, Clerk,

  
By: Krysten J. Coppoletta  
Deputy Clerk

**CERTIFICATE OF RETENTION OF ORIGINAL  
CERTIFICATE OF GOOD STANDING**

As attorney for the filer of the Motion for Admission *Pro Hac Vice* and Certificate of Good Standing attached thereto, I hereby certify that the filer or the filer's attorney currently holds the original Certificate of Good Standing with any required formalities, will make the same available upon request of this Court or of a party, and will retain the hard copy of the same for one year after the expiration of all time periods for appeals, or resolution of appeals, whichever is later.

Dated: March 28, 2008

/s/ Rusha C. Smith  
Attorney for General Electric Capital  
Corporation

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